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Attorneys for Defendant

STATE FARM GENERAL INSURANCE COMPANY

UNITED STATES DISTRICT COURT

CENTRAL DISTRICT OF CALIFORNIA

WILLIAM TONG; and MALINEE
DIBBAYAWAN,

Plaintiffs,

vs.

STATE FARM GENERAL
INSURANCE COMPANY; and DOES
1 to 10,

Defendants.

) Case No.: 2:24-cv-02219-DSF-MAR

) **DISCOVERY MATTER**

) Magistrate Judge Margo A. Rocconi

) **DEFENDANT STATE FARM
GENERAL INSURANCE
COMPANY'S NOTICE OF
MOTION TO ENTER
PROTECTIVE ORDER**

) *Filed concurrently with:*

-) *Memorandum of Points and Authorities*
-) *Request for Judicial Notice*
-) *Declaration of Daniel T. Balmat*
-) *Declaration of Sandra E. Stone*
-) *Declaration of John Carter*
-) *Declaration of Christopher Thomas*
-) *[Proposed] Order*

) **--OPPOSED--**

) Date: January 15, 2025

) Time: 11:00 a.m.

) Courtroom: 790

) Complaint filed: March 19, 2024

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1 TO PLAINTIFFS AND THEIR ATTORNEYS OF RECORD:

2 PLEASE TAKE NOTICE that on January 15, 2025, at 11:00 a.m., or as
3 soon thereafter as the matter may be heard in the above-entitled court, located at
4 Roybal Federal Building and United States Courthouse, 255 E. Temple St., Los
5 Angeles, CA, 90012, Defendant STATE FARM GENERAL INSURANCE
6 COMPANY (“State Farm”) will move the Court to enter State Farm’s proposed
7 protective order.

8 This Motion is based upon this Notice; the accompanying Memorandum of
9 Points and Authorities, Declarations and exhibits thereto, Request for Judicial
10 Notice, the complete files and record in this action, and on such further oral or
11 documentary evidence as may be presented at or before the hearing of this motion.

12 This Motion is made following a series of correspondence and phone calls
13 between State Farm and Plaintiffs, including a conference of counsel on October
14 14, 2024; pursuant to F.R.C.P. 26(f) and Local Rule 37-1, State Farm certifies that
15 it has conferred in good faith with Plaintiffs regarding the issues that are the
16 subject of this motion.

17
18 DATED: November 26, 2024

PACIFIC LAW PARTNERS, LLP

19
20 By: /s/MATTHEW F. BATEZEL

21 MATTHEW F. BATEZEL

22 DANIEL T. BALMAT

23 Attorneys for Defendant

24 STATE FARM GENERAL

INSURANCE COMPANY